



Code of Conduct

Code of Conduct

AUT-CORP-PO-CS-0002 | Revision 1 | 04 Aug 2026

Revision History				
Rev	Date	Summary of Changes	Author	Approved
0	31-Jan-23	Original issue, signed by the Managing Director	John Ha	John Ha
1	04-Aug-26	Broadened from supplier expectations to cover AUTONOMA workers. Speaking up, remedy, integrity and remediation sections added.	Adrian Krop	John Ha



DOCUMENT CONTROL

Document number	AUT-CORP-PO-CS-0002
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CHANGES IN THIS REVISION

- Reissued in the AUTONOMA controlled-document template and assigned document number AUT-CORP-PO-CS-0002.
- Scope broadened so the Code applies to AUTONOMA workers and Directors as well as to suppliers, contractors, consultants and agents.
- Australian legislative references added, covering the Work Health and Safety Act 2020 (WA), the Fair Work Act 2009 (Cth), the Equal Opportunity Act 1984 (WA), the Modern Slavery Act 2018 (Cth), the Competition and Consumer Act 2010 (Cth), the Criminal Code Act 1995 (Cth), the Privacy Act 1988 (Cth) and the Corporations Act 2001 (Cth).
- Definitions section added and the principle that the most stringent requirement applies where local law conflicts with this Code retained and made explicit.
- New sections added for child labour, freedom of association, wages and working hours, discrimination, harassment and bullying, conflicts of interest, confidentiality and data, and suppliers and the supply chain.
- Cross-references added to AUT-CORP-PO-CS-0003 Competition Policy, AUT-CORP-PO-CS-0004 Gifts, Meals and Entertainment Policy, AUT-CORP-PO-CS-0005 Trade Controls and Sanctions Policy and AUT-CORP-PO-CS-0006 Modern Slavery Policy.
- Speaking Up and Whistleblower Protection section added, with the protections for eligible whistleblowers under Part 9.4AAA of the Corporations Act 2001 (Cth).
- Inspection, audit and corrective action requirements given frequencies, named accountabilities and escalation steps, and the Access to Remedy section retained and expanded.
- Training and Competency, and Monitoring, Records and Review sections added, including a records and retention table and the review trigger.
- Spelling of the entity name corrected where the original read "AUTINOMA".



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1 PURPOSE

Autonoma Technology Pty Ltd (AUTONOMA) depends on long-term business relationships built on trust and shared values with its workers, clients, suppliers and contractors. This Code of Conduct exists so that every person who works for AUTONOMA, and every organisation that supplies to it, behaves lawfully, safely and honestly, and so that a person harmed by AUTONOMA's operations or business relationships has a route to remedy.

The Code sets the minimum standards AUTONOMA requires. It states what AUTONOMA expects of its own people and of its supply chain on safety, human rights and labour, business integrity, information, the environment, speaking up and remedy.

AUTONOMA values competence, cooperation and responsibility, and holds every party to a business relationship with it to the standards in this Code.

2 SCOPE

This Code applies to:

- Every AUTONOMA worker, including employees, labour hire personnel, apprentices and trainees.
- The Directors and every officer of AUTONOMA.
- Contractors, subcontractors, consultants, agents, representatives and any other person acting for or on behalf of AUTONOMA.
- Suppliers of goods and services to AUTONOMA, and their own suppliers and subcontractors to the extent of the work performed for AUTONOMA.

It applies at every AUTONOMA facility, at every client and third party site, in every jurisdiction in which AUTONOMA operates or sources, and to work carried out remotely. It applies to conduct outside working hours where that conduct affects the safety of others, the interests of AUTONOMA or a person's fitness for work.

Full compliance with all applicable local and national law and regulation, in letter and in spirit, is required of every party to a business relationship with AUTONOMA. Where a local law and this Code differ, the more stringent requirement applies. Where a local law would require conduct that this Code prohibits, the matter is escalated to the Directors before any commitment is made, and the work does not proceed until the Directors have resolved it in writing.

This Code does not replace an employment contract, a supply agreement or a subordinate policy. It sets the standard those instruments give effect to. It does not set the method for any process; the procedures listed in *References* do that.



3 DEFINITIONS

Term	Meaning
Worker	A person who carries out work in any capacity for AUTONOMA, including an employee, labour hire worker, apprentice, trainee, contractor, subcontractor and a worker of a contractor or subcontractor.
Supplier	Any organisation or individual that supplies goods, services, labour or equipment to AUTONOMA, including a second tier supplier where the goods or services form part of what AUTONOMA receives.
Modern slavery	Conduct amounting to a practice defined in section 4 of the Modern Slavery Act 2018 (Cth), including trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.
Child	A person under 15 years of age, or under the minimum working age set by the applicable local law where that age is higher, or under 18 years of age for hazardous work.
Forced labour	Any work or service exacted from a person under the menace of a penalty, and for which the person has not offered themselves voluntarily, including work rendered voluntarily but under threat of sanction.
Government official	Any officer, employee or representative of a government, government agency, government owned or controlled enterprise, public international organisation or political party, at any level, and any candidate for public office.
Conflict of interest	Any circumstance in which a personal, financial, family or other outside interest could improperly influence, or reasonably appear to influence, a decision made for AUTONOMA.
Conflict minerals	Tin, tantalum, tungsten, gold and any other mineral designated by an applicable law or standard as originating from a conflict-affected or high-risk area.
Eligible whistleblower	A person given that status by section 1317AAA of the Corporations Act 2001 (Cth), including a current or former officer, employee, supplier of goods or services, employee of a supplier, and a relative or dependant of any of them.
Detrimental conduct	Conduct that causes detriment to a person because they have made, or are believed to have made, a disclosure, including dismissal, injury in employment, alteration of position, discrimination, harassment, intimidation and damage to property or reputation.
Remedy	The action taken to restore a person adversely affected by AUTONOMA's operations or business relationships to the position they would have held, including apology, restitution, compensation, reinstatement and the prevention of recurrence.



4 POLICY STATEMENT

AUTONOMA will:

1. Comply with all applicable law and regulation, in letter and in spirit, and apply the more stringent of the local law and this Code wherever the two differ.
2. Provide and maintain a safe and healthy working environment for its workers, contractors and visitors, and require the same of every supplier.
3. Respect the personal dignity, integrity, privacy and human rights of every individual employed by, or affected by, its operations and business relationships.
4. Refuse to use, and refuse to knowingly benefit from, child labour, forced labour, compulsory labour, human trafficking or any other form of modern slavery, in its own operations or in its supply chain.
5. Respect the right of every worker to join or not to join a union, to be represented, and to bargain collectively, and refuse to disadvantage a worker for exercising that right.
6. Pay at least the applicable legal minimum wage and entitlements, pay on time, make no unlawful deduction, and comply with all applicable working hours, overtime, rest break and night work requirements.
7. Provide a workplace free of discrimination, harassment, sexual harassment, bullying and victimisation, and select, pay, promote and develop people on merit.
8. Refuse to participate in, or benefit from, corruption, extortion, bribery, secret commissions or facilitation payments in any form, whether offered to a government official or to a private party.
9. Compete on merit and comply with competition law, under AUT-CORP-PO-CS-0003 Competition Policy.
10. Comply with trade control, sanctions and customs law, under AUT-CORP-PO-CS-0005 Trade Controls and Sanctions Policy.
11. Declare and manage every conflict of interest, and record and approve gifts, meals and entertainment under AUT-CORP-PO-CS-0004 Gifts, Meals and Entertainment Policy.
12. Protect confidential information, personal information and intellectual property, whether AUTONOMA's or a third party's.
13. Identify and reduce the adverse environmental impacts of its operations, its supply chain and the use of the products and services it supplies, under AUT-CORP-PO-EN-0001 Environmental and Sustainability Policy.
14. Provide channels through which any person may raise a concern about conduct, including anonymously, protect the identity of a person who does so, and protect eligible whistleblowers as Part 9.4AAA of the Corporations Act 2001 (Cth) requires.
15. Investigate every reported breach of this Code, remediate the harm, and prefer remediation and capability building over termination of a business relationship where the supplier is willing and able to correct the breach.
16. Work towards appropriate and adequate remedy for any stakeholder adversely affected by its operations or its business relationships.

No AUTONOMA target for cost, schedule, revenue or production justifies a breach of this Code. Any worker may refuse an instruction that would breach it, and may stop work under AUT-CORP-PO-SA-0011 Stop Work Authorisation Policy where the breach concerns safety.



5 ROLES AND RESPONSIBILITIES

Table 1: Code of Conduct responsibilities

Role	Responsibility
Directors	Own this Code and are jointly accountable for its application. Act as eligible recipients for whistleblower disclosures. Decide any matter escalated because a local law conflicts with this Code, and record the decision in writing. Approve the remediation plan for every material breach. Review breach reports, audit results and remedy outcomes at each management review, held at least annually.
Managing Director	Approves this Code and each revision. Determines the outcome of a serious breach, including termination of employment or of a supply relationship. Signs the Code and issues it to workers and suppliers.
HSEQ Manager	Maintains this Code and its records. Delivers Code of Conduct training and verifies completion. Maintains the register of declared conflicts of interest and the record of reported breaches. Plans and conducts supplier audits and inspections. Tracks every corrective action and remediation plan to closure and reports overdue actions to the Directors monthly.
Operations Manager	Applies this Code in the workshop, warehouse and site workforce. Ensures no worker is disadvantaged for raising a concern. Verifies that engaged contractors have accepted this Code before they start work.
Project Manager	Applies this Code on a specific project or contract. Confirms that project suppliers and subcontractors have accepted this Code, and reports any client requirement that is more stringent than this Code so that the more stringent requirement is applied.
Supervisors	Model the standards in this Code. Receive and escalate concerns raised by workers within one working day. Refuse and report any instruction, incentive or pressure that would breach this Code.
Workers	Comply with this Code. Complete Code of Conduct training. Declare a conflict of interest and report a gift received, under AUT-CORP-PO-CS-0004 Gifts, Meals and Entertainment Policy. Report any suspected breach of this Code. Cooperate fully and honestly with an investigation.
Contractors and Suppliers	Accept and comply with this Code as a condition of engagement. Meet the minimum standards in it, maintain records demonstrating compliance, pass the standards down their own supply chain, permit audit and inspection, inform AUTONOMA of any non-compliance they identify, and complete an agreed corrective action or remediation plan.
Visitors	Comply with site directions, confidentiality requirements and safety requirements while at an AUTONOMA workplace.



6 HEALTH AND SAFETY

Every party to this Code must provide and maintain a safe and healthy working environment for its employees and contractors. Workers must comply with the health and safety policies in place, and leaders are accountable for implementing them.

Every party must support AUTONOMA's incident-free target and must work consistently to prevent and to record fatalities, injuries and occupational disease in their operations.

A supplier must demonstrate a safety management program that meets the applicable law and that includes, as a minimum:

- An approved health and safety policy commitment signed by its most senior officer.
- Hazard identification and risk assessment covering the work it performs for AUTONOMA.
- Action plans that close the risks identified, with owners and due dates.
- Safety incident reporting and investigation, with corrective actions tracked to closure.
- Instruction, training and competency verification for its workers.

Appropriate workplace conditions and equipment must be in place at all times, including fire safety measures, unobstructed evacuation routes and emergency exits, and emergency response arrangements. Access to the personal protective equipment required for the work must be provided to employees and contractors at the party's own cost.

AUTONOMA applies these requirements to itself through AUT-CORP-PO-SA-0001 Health and Safety Policy and AUT-CORP-PL-SA-0001 Health, Safety, Environment and Quality Management Plan, and assesses contractors against them under AUT-CORP-PO-SA-0018 Contractor Management Policy before engagement.

7 HUMAN RIGHTS AND LABOUR STANDARDS

Every party must respect the personal dignity, integrity, privacy and human rights of each individual employed by, or affected by, its business operations. AUTONOMA supports the International Bill of Human Rights, the International Labour Organization Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights.

7.1 Child labour

No party may employ a child. Where a young person above the minimum working age is employed, the work must not be hazardous, must not interfere with schooling, and must comply with the hours and conditions the applicable law sets for young workers. Age is verified at recruitment against original documentation, and the verification record is retained.

Where child labour is found, the child's welfare governs the response. The party removes the child from the work, arranges for the child's education and support in consultation with the child's family, and does not simply dismiss the child. The matter is reported to the Directors immediately.



7.2 Forced labour and modern slavery

No forced or compulsory labour is tolerated. This includes any labour rendered involuntarily, and any labour rendered voluntarily but under threat of a sanction.

- No deduction may be made from a worker's wages as a disciplinary measure, and no physical or financial sanction may be used as a disciplinary measure.
- A worker must be free to retain all personal documentation, including identity and travel documents, at all times.
- A worker must be free to remove themselves from a potentially hazardous situation at any point, and free to leave the workplace at the end of a shift and to terminate employment on reasonable notice.
- A worker must be provided with a written employment contract, before starting work, in a language in which the worker is proficient, and must be given a copy of it.
- No worker may be charged a recruitment fee, and any fee paid by a worker is repaid by the party that engaged them.
- No form of debt bondage, bonded labour, indentured labour or withholding of wages as a retention device is permitted.

Modern slavery risk in the AUTONOMA supply chain is assessed and managed under AUT-CORP-PO-CS-0006 Modern Slavery Policy.

7.3 Freedom of association

Every worker is free to join or to decline to join a lawful union or worker organisation, to seek representation, to elect representatives and to bargain collectively, without interference, disadvantage, intimidation or reprisal. Where local law restricts freedom of association, the party must not obstruct alternative lawful means for workers to associate and to raise matters collectively.

Worker representatives are given reasonable access to the workplace and to management, and are not disadvantaged in employment for performing that role.

7.4 Wages, working hours and conditions

Wages and entitlements must meet or exceed the applicable legal minimum, the applicable modern award or industrial instrument, and the prevailing industry standard, whichever is highest. Wages must be paid on time, through a traceable method, and be accompanied by a written pay statement the worker can understand. Deductions must be lawful and authorised.

Equal pay is provided for work of equal value, and pay is not set by reference to a protected attribute.

All applicable working hours, overtime and night work requirements must be complied with. Overtime must be voluntary, must be paid at the applicable premium rate, and must not be used to circumvent maximum hours. Workers must receive the rest breaks, daily rest and weekly rest days the applicable law requires. Fatigue arising from hours of work is managed under AUT-CORP-PO-SA-0014 Fatigue Management Policy.



Where a party provides accommodation to workers, that accommodation must be safe, clean, adequately ventilated, separately lockable, provided with potable water and sanitation, and free from any restriction on a worker's freedom of movement.

7.5 Discrimination, harassment and bullying

Every party must prohibit, by written policy and in practice, any discrimination on the grounds of race, colour, national or social origin, gender, sex, sexual orientation, gender identity, marital or family status, pregnancy, youth, age, disability, union membership, religious or political affiliation, or indigenous or tribal status. This includes unbiased recruitment processes, the security of employee personal data, and equal pay for equal work.

Harassment, sexual harassment, bullying, violence, threats, intimidation, degrading treatment and victimisation are prohibited. A party must provide a channel through which a worker may report such conduct, must investigate a report promptly, and must protect the person who reports from reprisal.

AUTONOMA applies the same standard to itself under the Equal Opportunity Act 1984 (WA), the Fair Work Act 2009 (Cth) and AUT-CORP-PO-SA-0015 Psychosocial Safety Policy, and treats discrimination, harassment and bullying as psychosocial hazards to be controlled, not merely as conduct matters.

8 BUSINESS INTEGRITY

8.1 Bribery and corruption

No party may participate in, or benefit from, any form of corruption, extortion or bribery. This includes:

- Any payment, gift or other benefit conferred on a government official, directly or through an intermediary, to influence a decision or to obtain a business advantage.
- Any payment, gift or other benefit conferred on an AUTONOMA worker, a supplier or a customer to influence a decision.
- Any secret commission, kickback, rebate or undisclosed benefit connected with a purchase, sale, tender or approval.
- Facilitation payments, which are prohibited without exception, including small payments made to secure or expedite a routine government action.

Bribing a foreign public official is a criminal offence under Division 70 of the Criminal Code Act 1995 (Cth), for which both the individual and AUTONOMA can be prosecuted. A demand for a bribe or a facilitation payment is refused and reported to a Director on the same day. Where a payment is made under duress because a person's safety is at immediate risk, the payment is reported to the Directors immediately afterwards and recorded.

Third parties who act for AUTONOMA, including agents, distributors, brokers and customs brokers, are subject to due diligence before appointment, are engaged in writing on terms that include this Code, and are paid only for services actually rendered, at a commercially justifiable rate, to an account in the name of the engaged party.



8.2 Gifts, meals and entertainment

No gift, meal or entertainment may be offered, given, requested or accepted with the intention of persuading or otherwise influencing an AUTONOMA worker or any other person, or where it would create the appearance of improper influence.

Every AUTONOMA worker must report every gift received, and every gift, meal or item of entertainment given or received above the recording threshold is entered in AUT-CORP-RG-CS-0001 Gifts, Meals and Entertainment Register. The approval thresholds, the prohibited categories and the register requirements are set by AUT-CORP-PO-CS-0004 Gifts, Meals and Entertainment Policy.

8.3 Conflicts of interest

No conflict of interest may arise, undisclosed, between an AUTONOMA worker or entity and a supplier, contractor or customer. A worker must declare in writing to their Supervisor and to the HSEQ Manager any actual, potential or perceived conflict of interest as soon as the worker becomes aware of it, and in any case before participating in a decision affected by it.

Circumstances requiring declaration include:

- A financial interest in, or a directorship or other position with, a supplier, contractor, competitor or customer.
- A close personal or family relationship with a person employed by a supplier, contractor, competitor or customer, or with a candidate for employment at AUTONOMA.
- Secondary employment, consulting or a business activity that competes with AUTONOMA or uses AUTONOMA time, information or assets.
- Involvement in the selection, evaluation or supervision of a party with whom the worker has any of the above relationships.

The HSEQ Manager records each declaration in the conflicts of interest register. The Directors determine the management action, which may include removing the worker from the decision, appointing an independent reviewer, or declining the transaction. A declared and managed conflict is not a breach of this Code; an undeclared conflict is. Every worker confirms their declarations annually.

8.4 Fair competition

Every party must compete on merit and must comply with the Competition and Consumer Act 2010 (Cth) and equivalent law in each jurisdiction where AUTONOMA operates. Cartel conduct, price fixing, bid rigging, market sharing, output restriction, the exchange of competitively sensitive information and misleading or deceptive conduct are prohibited. The requirements, the prohibited conduct and the immediate-escalation rule for an approach from a competitor are set by AUT-CORP-PO-CS-0003 Competition Policy.

8.5 Trade controls and sanctions

Every party must comply with applicable sanctions, export control, import control and customs law. No party may supply goods, software, technology or services on AUTONOMA's behalf to a sanctioned person, entity or country, or divert them to a prohibited end use or end user. The



screening, licensing, classification and record keeping requirements are set by AUT-CORP-PO-CS-0005 Trade Controls and Sanctions Policy.

9 CONFIDENTIALITY, INFORMATION AND INTELLECTUAL PROPERTY

Every party must manage information so that no breach of AUTONOMA's intellectual property rights occurs, and so that a third party's intellectual property rights are respected.

- Confidential information of AUTONOMA, its clients and its suppliers is used only for the purpose for which it was provided, is disclosed only to those who need it for that purpose, and is returned or destroyed when the purpose ends or the engagement terminates.
- Designs, drawings, software, firmware, configurations, test data, methods and know-how created by a worker or a supplier in the course of work for AUTONOMA belong to AUTONOMA unless a written agreement provides otherwise.
- No party may copy, reverse engineer or reuse a third party's design, software or documentation without a licence, and no unlicensed software is installed on an AUTONOMA device or on a device used to perform work for AUTONOMA.
- Client data encountered during installation, commissioning or servicing is accessed only to the extent the task requires, is not copied or removed from the client's environment without written client authority, and is not used for any other purpose.
- Personal information, including worker personal data, is collected, used, stored, disclosed and destroyed in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles. Worker health information is held under AUT-CORP-PO-HR-0001 Medical Record Retention Policy.
- A suspected loss, unauthorised access to or unauthorised disclosure of confidential or personal information is reported to a Director within one working day so that the eligible data breach obligations under the Privacy Act 1988 (Cth) can be assessed.
- Public statements, media comment and social media posts about AUTONOMA, a client or a project are made only by a person authorised by a Director.

Documents and records are controlled under AUT-CORP-PR-QA-0001 Document and Data Control Procedure.

10 ENVIRONMENT, MATERIAL COMPLIANCE AND CONFLICT RESOURCES

AUTONOMA identifies the positive and the adverse environmental impacts of its activities on a life cycle basis, covering impacts arising from its own operations, impacts originating in its supply chain, and impacts from the use of the products and services it supplies.

Environmental management plans are produced to increase the positive impacts and reduce the adverse impacts. AUTONOMA maintains an environmental management program under AUT-CORP-PO-EN-0001 Environmental and Sustainability Policy and requires every worker and contractor to uphold and take responsibility for that program, including its improvement plans, worker training and training records, and emergency preparedness and response planning.

Every party must conduct due diligence to ensure that the procurement, use or sale of natural resources and conflict minerals complies with applicable international standards, including the



OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

A supplier must ensure that every good provided to AUTONOMA complies with the requirements of all relevant standards and regulations controlling prohibited and restricted substances, and must provide, on request and before delivery, the declarations, Safety Data Sheets and material composition information needed to demonstrate that compliance. A good that cannot be demonstrated as compliant is quarantined on receipt under AUT-CORP-PR-SC-0001 Warehouse Goods Inwards and Outwards Procedure.

11 SUPPLIERS AND THE SUPPLY CHAIN

Suppliers and contractors are expected to transmit the values and requirements in this Code down through their own supply chain, and to be able to demonstrate that they have done so.

- This Code is issued to every supplier and contractor before engagement, and acceptance of it is a condition of engagement. Purchase orders and supply agreements incorporate it by reference.
- A supplier assessed as higher risk, on the basis of the country of operation, the category of goods or services, the use of labour hire, or the length and opacity of its own supply chain, completes a written self-assessment before engagement and at least every two years thereafter.
- A supplier must maintain records demonstrating compliance with this Code and must make them available to AUTONOMA on request.
- Where a supplier identifies any non-compliance with this Code, in its own operations or in its supply chain, it must actively inform AUTONOMA management so that the gap can be assessed and rectified. Concealment of a non-compliance is treated as a material breach.
- Where a material breach is identified, AUTONOMA and the supplier promptly design and implement a remediation plan, with agreed actions, owners and timeframes. This applies in particular to any instance of child labour, forced labour or compulsory labour, which is escalated to the Directors on the day it is identified.
- Termination of a supply relationship is the last response, not the first. AUTONOMA terminates where the supplier is unwilling to remediate, fails to meet an agreed remediation plan, or where the breach is so serious that continuing the relationship is untenable. The effect of termination on affected workers is considered before the decision is made.

Contractor selection, assessment and management are carried out under AUT-CORP-PO-SA-0018 Contractor Management Policy.

12 SPEAKING UP AND WHISTLEBLOWER PROTECTION

Any worker, supplier, contractor or other person may report a suspected breach of this Code, of the law, or of any AUTONOMA policy. A report may be made:

- To the person's Supervisor or Manager.
- To the HSEQ Manager.
- To either Director, each of whom is an eligible recipient for the purposes of Part 9.4AAA of the Corporations Act 2001 (Cth).



- Through the AUTONOMA confidential reporting channel, which accepts anonymous reports.

A report may be made anonymously, and a person who reports anonymously is protected in the same way as a person who identifies themselves. A person who wishes to remain anonymous is asked to provide a means of ongoing contact so that the investigator can seek further information, but is not required to do so.

AUTONOMA does not tolerate detrimental conduct against a person who makes, or is believed to have made, a report. Any threatened or actual detrimental conduct is itself a serious breach of this Code, is investigated as such, and may result in immediate termination. A worker who suffers detrimental conduct because of a disclosure may also have a right to compensation under the Corporations Act 2001 (Cth).

Where a disclosure qualifies for protection under Part 9.4AAA of the Corporations Act 2001 (Cth), the identity of the discloser, and any information likely to reveal it, is not disclosed without the discloser's consent except as that Act permits. Disclosure records are held separately from personnel files, with access restricted to the Directors and the investigator.

The Directors acknowledge receipt of a report within five working days where a contact channel exists, appoint an investigator who has no involvement in and no interest in the matter, and complete the investigation within 30 working days or advise the discloser of the revised timeframe and the reason. The outcome, the corrective actions and the remedy are recorded. Where the report concerns a Director, the other Director appoints an independent external investigator.

Making a report in good faith does not expose a person to disciplinary action, even where the report is not substantiated. Knowingly making a false report is a breach of this Code.

13 INSPECTIONS, AUDITS AND CORRECTIVE ACTION

AUTONOMA keeps records documenting its management systems and its practices for each issue covered by this Code, so that compliance can be demonstrated to a client, an auditor or a regulator.

AUTONOMA regularly audits and inspects operations and facilities, including through third party auditors. In addition to a supplier's own operations, an audit scope may include residential facilities provided to that supplier's employees, and second tier suppliers, where a specific risk has been identified.

On-site audits and inspections are normally scheduled in advance. In exceptional cases, where advance notice would defeat the purpose of the audit, an audit or inspection proceeds without prior notification. The right to audit, including unannounced audit, is stated in the supply agreement.

The HSEQ Manager plans the audit program annually on the basis of assessed risk, audits every supplier assessed as higher risk at least every three years, and audits any supplier against which a substantiated breach has been recorded within 12 months of the finding.



Where an audit or inspection raises a non-conformity with this Code, the supplier and AUTONOMA agree a written Corrective Action and Remediation Plan setting out the corrections or remediation required, the accountable person and the timeframe. The HSEQ Manager verifies closure by evidence, and by re-inspection where the non-conformity concerned safety, human rights or labour standards. A plan that is not met is escalated to the Directors.

14 ACCESS TO REMEDY

AUTONOMA and every party involved with AUTONOMA is committed to working towards appropriate and adequate remedy for any stakeholder adversely affected by AUTONOMA's business operations and business relationships.

Where an adverse impact is caused or contributed to by AUTONOMA, AUTONOMA provides or cooperates in the remedy directly. Where the impact arises through a supplier or a customer, AUTONOMA works jointly with that entity to design and implement a remediation plan, with a set timeline proportionate to the severity of the breach and the risk to the people affected.

Remedy is designed with the affected people, addresses the harm rather than the reputational consequence, and includes the action needed to prevent recurrence. Where this approach is inadequate, or where the affected party is not satisfied with it, an affected internal or external party may submit a report through the channels in *Speaking Up and Whistleblower Protection*, including the AUTONOMA whistleblower channel, and may pursue any external avenue available to them. AUTONOMA does not require a person to waive a right, or to sign a confidentiality undertaking about the underlying conduct, as a condition of receiving remedy.

The Directors review every remedy outcome at management review and record the systemic change made as a result.

15 TRAINING AND COMPETENCY

Every worker completes Code of Conduct training during induction, before starting work, under AUT-CORP-PR-HR-0001 Onboarding and Training Procedure, and signs an acknowledgement that they have received, read and will comply with this Code.

The training covers the standards in this Code, the worker's own obligations, how to recognise a bribe, a conflict of interest, a competition law risk and a modern slavery indicator, how to declare and report, the protections available to a person who reports, and the consequences of a breach.

Workers who negotiate with suppliers or customers, prepare or price tenders, engage contractors, arrange imports or exports, or attend industry events complete additional targeted training on AUT-CORP-PO-CS-0003 Competition Policy, AUT-CORP-PO-CS-0004 Gifts, Meals and Entertainment Policy and AUT-CORP-PO-CS-0005 Trade Controls and Sanctions Policy before undertaking that work.

Supervisors and Managers complete additional training in receiving and escalating a disclosure, protecting a discloser and avoiding detrimental conduct.



Competency is verified by the HSEQ Manager through a written assessment at the end of the training. Refresher training is completed at least every two years, and additionally whenever this Code is revised or an investigation identifies a gap in understanding. Training records are held under AUT-CORP-PR-HR-0002 Skills and Development Procedure.

16 MONITORING, RECORDS AND REVIEW

Compliance with this Code is monitored through:

- Signed acknowledgements collected from every worker at induction and at each revision of this Code, reconciled against the employee list at least annually.
- Annual confirmation by every worker of their conflict of interest declarations.
- Review of AUT-CORP-RG-CS-0001 Gifts, Meals and Entertainment Register by the Directors at least quarterly.
- The supplier self-assessment and audit program described in *Inspections, Audits and Corrective Action*.
- Review of every reported breach, investigation outcome, corrective action and remedy at each management review, held at least annually.
- Internal audit against this Code at least annually under AUT-CORP-PL-SA-0001 Health, Safety, Environment and Quality Management Plan.

A breach of this Code by a worker is managed under the graduated remedial action process in AUT-CORP-PO-CS-0001 General Policy, and a serious breach may result in immediate termination. A breach by a contractor or supplier is managed under *Inspections, Audits and Corrective Action* and may result in suspension or termination of the engagement. A breach that may constitute a criminal offence is reported to the relevant authority on the advice of the Directors.

Table 2: Code of Conduct records and retention

Record	Held by	Retention
Signed current revision of this Code	HSEQ Manager	Current version live; superseded versions 7 years
Worker acknowledgements of this Code	HSEQ Manager	7 years after separation
Conflict of interest register and declarations	HSEQ Manager	7 years after the declaration ceases to be current
Gifts, meals and entertainment records	HSEQ Manager, in AUT-CORP-RG-CS-0001	7 years
Supplier acceptances, self-assessments and audit reports	HSEQ Manager	7 years after the engagement ends
Corrective Action and Remediation Plans and closure evidence	HSEQ Manager	7 years after closure
Reports of suspected breaches and investigation records	Directors, confidentially	7 years after closure
Whistleblower disclosure records	Directors, confidentially and separately from personnel files	7 years after closure
Remedy records, including remedy provided to affected persons	Directors	7 years after closure



Record	Held by	Retention
Code of Conduct training and competency records	HSEQ Manager	7 years after separation

This Code is reviewed annually. It is also reviewed whenever the legislation changes, a new sourcing country, supplier category or business activity is introduced, a substantiated material breach is recorded, a client imposes a standard more stringent than this Code, or an audit finding indicates the Code is not effective. The Directors own the review and the Managing Director approves each revision. The current revision is issued to every worker, provided to every supplier and contractor, and made available to clients on request.

17 REFERENCES

17.1 Legislation and Standards

Reference	Subject
Corporations Act 2001 (Cth), Part 9.4AAA	Whistleblower protection and eligible recipients
Criminal Code Act 1995 (Cth), Division 70	Bribery of foreign public officials
Competition and Consumer Act 2010 (Cth)	Competition and consumer law
Modern Slavery Act 2018 (Cth)	Modern slavery
Fair Work Act 2009 (Cth)	Employment, wages, hours, freedom of association, general protections
Equal Opportunity Act 1984 (WA)	Discrimination and harassment
Work Health and Safety Act 2020 (WA)	Primary duty of care and duties of workers
Work Health and Safety (General) Regulations 2022 (WA)	General duties, facilities, personal protective equipment
Privacy Act 1988 (Cth) and the Australian Privacy Principles	Personal and health information, eligible data breaches
Environmental Protection Act 1986 (WA)	Environmental protection
Autonomous Sanctions Act 2011 (Cth) and Autonomous Sanctions Regulations 2011 (Cth)	Sanctions
Customs Act 1901 (Cth)	Import and export controls
ISO 45001:2018	Occupational health and safety management systems
ISO 14001:2015	Environmental management systems
ISO 45003:2021	Psychological health and safety at work

17.2 AUTONOMA Documents

Document number	Title
AUT-CORP-PO-CS-0001	General Policy



Document number	Title
AUT-CORP-PO-CS-0003	Competition Policy
AUT-CORP-PO-CS-0004	Gifts, Meals and Entertainment Policy
AUT-CORP-PO-CS-0005	Trade Controls and Sanctions Policy
AUT-CORP-PO-CS-0006	Modern Slavery Policy
AUT-CORP-PO-EN-0001	Environmental and Sustainability Policy
AUT-CORP-PO-HR-0001	Medical Record Retention Policy
AUT-CORP-PO-QA-0001	Quality Policy
AUT-CORP-PO-SA-0001	Health and Safety Policy
AUT-CORP-PO-SA-0011	Stop Work Authorisation Policy
AUT-CORP-PO-SA-0014	Fatigue Management Policy
AUT-CORP-PO-SA-0015	Psychosocial Safety Policy
AUT-CORP-PO-SA-0018	Contractor Management Policy
AUT-CORP-PL-SA-0001	Health, Safety, Environment and Quality Management Plan
AUT-CORP-PR-QA-0001	Document and Data Control Procedure
AUT-CORP-PR-SA-0003	Incident Reporting and Investigation Procedure
AUT-CORP-PR-SC-0001	Warehouse Goods Inwards and Outwards Procedure
AUT-CORP-PR-HR-0001	Onboarding and Training Procedure
AUT-CORP-PR-HR-0002	Skills and Development Procedure
AUT-CORP-RG-CS-0001	Gifts, Meals and Entertainment Register

17.3 External Guidance

Reference	Subject
United Nations Guiding Principles on Business and Human Rights	Business responsibility to respect human rights, and access to remedy
International Bill of Human Rights	Fundamental human rights
International Labour Organization Declaration on Fundamental Principles and Rights at Work	Freedom of association, forced labour, child labour, discrimination
OECD Guidelines for Multinational Enterprises on Responsible Business Conduct	Responsible business conduct and due diligence
OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas	Conflict minerals due diligence
Australian Securities and Investments Commission, Regulatory Guide 270 Whistleblower policies	Whistleblower policy content and handling
Attorney-General's Department, Commonwealth Modern Slavery Act guidance for reporting entities	Modern slavery due diligence and remediation



APPROVAL

Prepared by	Reviewed by	Approved by
Adrian Krop Director Date: 04-Aug-2026	Adrian Krop Director Date: 04-Aug-2026	John Ha Managing Director Date: 04-Aug-2026